UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE PFIZER INC. SECURITIES LITIGATION

No. 04 CV 9866 (LTS) (DFE)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, the Declaration of Gregory A. Markel, sworn to on July 17, 2009, and the exhibits attached thereto, Defendants Pfizer Inc., Dr. Henry A. McKinnell, Dr. John L. LaMattina, Karen L. Katen, Dr. Joseph M. Feczko and Dr. Gail Cawkwell (collectively, "Defendants"), will move before this Court, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, on October 5 through October 8, 2009, for an order, pursuant to Rule 702 of the Federal Rules of Evidence, precluding Plaintiffs from offering testimony or opinions from their experts, as more fully described in the accompanying memorandum of law.

Dated: New York, New York

July 17, 2009

CADWALADER, WICKERSHAM & TAFT LLP

By: /s/ Gregory A. Markel

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